

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

Case No. 2:17-cr-00301-JFC-1

v.

Electronically Filed via ECF

DAVID FRANCIS,

DEFENDANT.

HONORABLE SENIOR JUDGE
JOY F. CONTI

CONSENT MOTION FOR EXTENSION OF TIME
TO FILE PRE-TRIAL MOTIONS

AND NOW, comes the Defendant David Francis, by and through his attorney, Casey D. White who files, on his behalf, this Consent Motion For Extension Of Time To File Pre-Trial Motions and in support thereof avers:

1. On or about February 28, 2018 a Federal Grand Jury returned a six count Superseding Indictment against Defendant David Francis charging him with:

(i) one count of Conspiracy with Intent To Distribute 100 grams or more of heroin in and around November 2017 through in and around February 2017 in violation of 21 U.S.C. § 846 (Count 1);

(ii) one count of Possession with Intent to Distribute and Distribution of Heroin resulting in serious bodily injury on or about June 23, 2017 in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(c)(Count 2);

(iii) one count of Possession with Intent To Distribute and Distribution of Fentanyl resulting in serious bodily injury, on or about September 18, 2017, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(c)(Count 3);

(iv) one count of one count of Possession with Intent To Distribute and Distribution of Fentanyl, on or about September 21, 2017, in violation of 21 U.S.C. §§ 841(a)(1),

841(b)(1)(c)(Count 4); one count of Possession With Intent To Distribute Heroin, on or

about October 6, 2017, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(c)(Count 5); and,

(v) one count of Possession With Intent To Distribute Fentanyl, on or about October 6, 2017, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(c)(Count 6).

2. Defendant is detained.

3. Pre-Trial Motions are due on or before April 2, 2020.

4. Defense counsel and counsel for the Government have been negotiating to resolve this issue short of trial and it is anticipated that a Final Plea Agreement will shortly be finalized.

5. Accordingly, counsel files this Consent Motion For Extension Of Time To File Pre-Trial Motions, seeking an additional 60 days from April 2, 2020 until June 1, 2020 within which to file pre-trial motions.

6. Counsel has conferred with AUSA Tonya Goodman and she does not oppose and consents to the extension of time of 60 days or until June 1, 2020, as requested.

WHEREFORE, counsel respectfully requests the Court grant this Motion and grant an extension of time of 60 days from April 2, 2020 until June 1, 2020 to file pre-trial motions on behalf of this Defendant.

RESPECTFULLY SUBMITTED

/s/ Casey D. White

CASEY D. WHITE, ESQUIRE

March 28, 2020

LAW OFFICE OF CASEY D. WHITE
48 26th Street
Pittsburgh, Pennsylvania 15222
Phone: 412.995.3270
[Email: casey@caseywhitelaw.com](mailto:casey@caseywhitelaw.com)